

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

TRACEY DAMRAU, *et al.*,

Plaintiffs,

v.

COLIBRI GROUP, LLC.

Defendant.

Case No. 4:24-cv-01441-SEP

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS**

Defendant Colibri Group, LLC (“Defendant”) respectfully requests an extension of time to file a reply in support of its Motion to Dismiss. (Dkt #16). In support of its Motion, Defendant states as follows:

1. Plaintiffs filed their First Amended Complaint on January 9, 2025. (Dkt #15).
2. On January 23, 2025, Defendant moved to dismiss Plaintiffs’ First Amended Complaint. (Dkt #16).
3. On January 27, 2025, Plaintiffs filed an Unopposed Motion for Extension of Time to Respond to Defendant’s Motion to Dismiss, requesting a 21-day extension of their deadline to respond to Defendant’s motion, and an 11-day extension of Defendant’s deadline to file its reply. (Dkt #18).
4. On January 30, 2025, the Court granted Plaintiffs’ Unopposed Motion for Extension of Time to Respond to Defendant’s Motion to Dismiss, extending Plaintiffs’ deadline to respond to February 27, 2025, and Defendant’s deadline to file a reply to March 20, 2025. (Dkt #19).

5. Defendants request a 14-day extension of time to file a Reply in Support of its Motion to Dismiss, making the new deadline April 3, 2025.

6. This Motion is made in good faith and with no intent of delaying this matter. Defendant's counsel has pre-scheduled travel and the press of other business.

7. Counsel for Plaintiffs consents to this request.

8. No party will be prejudiced if the Court grants this request. As no Case Management Order has yet been entered, granting this Motion will not affect any other deadlines in this case.

WHEREFORE, Defendant respectfully requests that this Court grant this extension of time, up to and including April 3, 2025, for Defendant to file its reply.

Dated: March 12, 2025

/s/ Paul M. Croker  
Paul M. Croker (Bar #57000)  
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COUNSEL FOR COLIBRI GROUP, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 12, 2025, the foregoing was filed electronically using the Court's CM/ECF system which will serve a copy upon all parties of record.

/s/ Paul M. Croker